

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC

In the matter of:	)
	) RM-_____
Amendment of Parts 2 and 73 to protect the	)
historical significance of heritage AM	) MB Docket _____
broadcast call signs	)

**PETITION FOR RULEMAKING**

Today is August 20, it is National Radio Day. The organizers of National Radio Day describe it as “a time to honor one of the most longstanding electronic media and its role in our everyday lives.”<sup>1</sup> Five years from now, we will be celebrating the 100<sup>th</sup> anniversaries of the first licensed broadcast stations. Many of these stations, started by amateurs and experimenters were the first voices over the air. In addition to those pioneers, companies like Westinghouse Electric were setting strides in wireless. To this day, Westinghouse’s legacy lives on in stations such as WBZ and KDKA.

**AM radio has withstood the test of time**

Radio has changed many times over the years. New technology such as the ultra short waves that would eventually become FM radio and that new contraption called the television not to mention all of those satellites above us have all succeeded AM radio. AM radio technology has pretty much stayed the same over the years. It has definitely withstood the test of time. In the 1920s and into the early 1930s, a total of over 1,750 broadcast facilities were established. Of those, over 1,150 did not make it past June 1, 1932. For the over 600 stations that made it past 1932, 397 of them made it past the year 2000 and most are still on the air today.<sup>2</sup>

---

<sup>1</sup> - <http://www.nationalradioday.com/about/>

<sup>2</sup> - This is based on extensive research conducted by the REC Radio History Project which digitized the information from the Radio Service Bulletin series of public notices from 1920 to 1932. The overall goal of the REC History Project is to have all of the FCC/FRC history card data for all AM stations digitized

These 397 stations have become a part of our everyday lives as well as the lives of those several generations before us. With the exception of a handful of stations, such as WMBI in Chicago, these stations have changed owners multiple times. Each owner is trying to make the station a commercial success by building an audience who depends on the station for information and entertainment. Overall, these stations are a success story, especially in a time where AM radio is needing to be “revitalized”.

One important aspect of these AM stations that we grew up with despite the format and ownership changes is that the primary identity of the station, the call sign has been maintained in many cases. In fact, of the 397 facilities that survived over the years, 200 of them are operating on a call sign that was obtained for the station prior to June 1, 1932. These owners have recognized how engrained the identity of these stations have been over the years, even though the formats have changed.

### **How recent licensees have respected a station’s legacy**

Not all owners have been respectful of our radio heritage. In Chicago, the legendary call sign WMAQ which was on the air since March 29, 1922 was stricken from the air by Infinity Broadcasting to make the station WSCR “The Score”. The sports radio fad also killed the legendary call sign WHN from New York when Emmis flipped to “The Fan” in 1987. With the many sales of stations taking place these days, members of the public continue to worry if whether the new owner will carry on the heritage of those who pioneered these stations in the 1920s or whether to destroy nearly 100-year tradition for commercial greed, especially in cases where old call signs, such as three-letter calls can’t be easily reinstated.

The owners, the iHeart Medias, Cumulus and Bonneville of the world may own the broadcast equipment, the towers and the programming but there are two things that are still owned by the public, the public’s trust granted through a station license and the call sign namespace. This petition addresses the latter.

I do acknowledge some owners such as IHR Educational Broadcasting and Universal Media Access who recently purchased the heritage stations KHJ and KFWB in Los Angeles for keeping the call letters on the station and I do recognize that some large companies such as iHeart Media (Clear Channel) have been respecting the heritage call signs on powerhouse stations such as KFI.

### **Call signs are more than just letters, they are a bond with their community**

Like with historic buildings, the owner of the building is usually free to do whatever they want on the inside. On the outside though, they must maintain the original aesthetics. For a radio station, the legendary call sign is that outside aesthetic. It is as much a part of a community as a church built at the turn of the century or other place of historical significance. These legendary call signs must be protected as a part of the historical significance of radio, especially in light of the 100<sup>th</sup> anniversary of the medium.

### **The proposal at hand is two-fold**

First, I am proposing that the 200 AM stations that are currently using the call sign for their facility that was originally obtained for that facility prior to June 1, 1932 be considered a “heritage station” and subject to an additional rule that the call sign for the station can’t be changed.<sup>3</sup> These call signs are of historical significance and we feel that the public interest of maintaining a 100 year legacy has a much larger public interest benefit than destroying more of America’s history because the call sign does not “fit” the station’s untested format. We do note that stations can still identify the way they want and continue to market themselves in a manner that still respects the letters spoken once per hour.

---

<sup>3</sup> - See Appendix “B” for a list of the stations that are being considered for historical protection of their call signs.

Second, I am proposing that those AM facilities did change call signs over the years be permitted, if they desire, to reinstate a three-letter call sign or a four-letter call sign that would not normally be available in their area (such as a “W” call sign west of the Mississippi River) if that facility had used that call sign prior to June 1, 1932.<sup>4</sup>

### **What this proposal will NOT do**

- It will not compel AM stations to remain on the air even if they become financially unviable.
- It will not require an AM station to maintain their current frequency, power, station class, location or entertainment format, just the call sign and nothing else.
- It will not require an AM station to change their call letters to the heritage calls. It only opens a codified avenue if they wish to.
- It will not force another station to change their call letters if they are wanted by a heritage station which formally used those call letters. (This includes a suffixed FM or TV station which may have acquired the call letters in a previous acquisition.)

### **The public interest dictates historical preservation**

Despite what some may say and based on the competing technologies out there, AM radio is not dead and listeners in some markets such as San Francisco are proving that. Licensed AM broadcast radio will definitely make it to its 100-year anniversary and will hopefully be here for generations to come. We must pass on the legacy that was started by those radio pioneers of the 1920s and 1930s and assure that their dream and aspiration lives on. They were the ones who put all of this in motion. At the same time, we need to keep those call letters that have been a staple in the communities they serve and give them the historical protection that they deserve.

---

<sup>4</sup> - See Appendix “C” for a list of the stations that no longer use their 3-letter or non-compliant 4-letter call sign that are being considered to be allowed to voluntarily revert back to their heritage call sign.

## **Conclusion**

We are at a point now where the listening public and those who care about the past, present and future of this medium to step-in and support an effort to declare as historical landmarks, the call signs of the remaining 200 heritage stations and provide a way that other stations can get their 3-letter heritage call signs back if they wish to.

Congress has given the charge of assigning and maintaining call signs to the Commission.<sup>5</sup> Call signs are public resources and therefore, the public as a whole are stakeholders in their assignment. I am asking that the Commission consider and implement my proposed amendments to Parts 2 and 73 of the Commission's rules to maintain our last 200 remaining heritage call signs and allow other heritage stations to get their former call signs back.<sup>6</sup> Radio is about to become 100 years old and we need to make sure that we can hang on to the little bit of history that is still left. Thank you for your consideration.

Respectfully submitted,

Michelle Bradley  
11541 Riverton Wharf Rd.  
Mardela Springs, MD 21837  
<http://recnet.com>

August 20, 2016

---

<sup>5</sup> - See 47 U.S.C. §303(o).

<sup>6</sup> - See Appendix "A" for proposed rules.

**APPENDIX A**  
**PROPOSED RULE CHANGES**

**§ 2.302          Call signs.**

Footnote 3 is revised as follows:

<sup>3</sup> A 3 letter call sign now authorized and in continuous use by a licensee of a standard broadcast station may continue to be used by that station. The same exception applies also to frequency modulation and television broadcast stations using 5 letter call signs consisting of 3 letters with the suffix “FM” or “TV”. A 3 letter call sign may be reassigned to the licensee of a standard broadcast station if a showing is made that the call sign was in use for that facility in any period of time prior to June 1, 1932.

**§73.3550          Requests for new or modified call sign assignments.**

\* \* \* \* \*

(e) Except as permitted in paragraph (n) of this section, call signs beginning with the letter “K” will not be assigned to stations east of the Mississippi River, nor will call signs beginning with the letter “W” be assigned to stations west of the Mississippi River.

(f) Except as permitted in paragraph (n) of this section, only four-letter call signs (plus an LP, FM, TV or CA suffix, if used) will be assigned. The four letter call sign for LPFM stations will be followed by the suffix “-LP”. However, subject to the other provisions of this section, a call sign of a station may be conformed to a commonly owned station holding a three-letter call assignment (plus FM, TV, CA or LP suffixes, if used).

\* \* \* \* \*

(n) AM broadcast facilities that were originally licensed prior to June 1, 1932 may obtain an available call sign that was used on that facility prior to June 1, 1932 notwithstanding the geographical requirements of paragraph (e) nor the prohibition on three-letter call signs of paragraph (f) of this section.

(o) AM broadcast facilities that were originally licensed prior to June 1, 1932 and continue to operate with a call sign that was assigned to that facility prior to June 1, 1932 are considered heritage stations and for historical preservation reasons must retain that call sign for the life of the facility.

**APPENDIX B**  
**AM FACILITIES IDENTIFIED AS HAVING**  
**HISTORICALLY PROTECTED CALL SIGNS**

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
KBPS	4782	PORTLAND	OR	SCHOOL DISTRICT #1, MULTNOMAH COUNTY, OR	BENSON POLYTECHNIC INSTITUTE
KBTM	17692	JONESBORO	AR	EAST ARKANSAS BROADCASTERS OF JONESBORO, LLC	W.J. BEARDS TEMPLE OF MUSIC
KCRC	10856	ENID	OK	CHISHOLM TRAIL BROADCASTING CO.	WALLACE RADIO INSTITUTE
KDKA	25443	PITTSBURGH	PA	CBS RADIO EAST INC.	WESTINGHOUSE ELECTRIC & MANUFACTURING CO.
KDLR	15272	DEVILS LAKE	ND	DOUBLE Z BROADCASTING, INC.	RADIO ELECTRIC CO.
KEX	11271	PORTLAND	OR	CITICASTERS LICENSES, INC.	WESTERN BROADCASTING CO.
KFAB	26931	OMAHA	NE	CAPSTAR TX, LLC	NEBRASKA BUICK AUTO CO.
KFBK	10145	SACRAMENTO	CA	AMFM BROADCASTING LICENSES, LLC	KIMBALL UPSON CO.
KFEQ	34419	ST. JOSEPH	MO	EAGLE COMMUNICATIONS, INC.	J.L. SCROGGIA
KFI	34425	LOS ANGELES	CA	CAPSTAR TX, LLC	EARL C. ANTHONY
KFIZ	36419	FOND DU LAC	WI	RBH ENTERPRISES, INC.	DAILY COMMONWEALTH AND OSCAR A. HUELSMAN
KFJB	40465	MARSHALLTOWN	IA	MARSHALLTOWN BROADCASTING, INC.	MARSHALL ELECTRIC CO.
KFKA	71443	GREELEY	CO	MUSIC VENTURES, LLC, DBA BROADCAST MEDIA LLC	COLORADO STATE TEACHERS COLLEGE
KFOR	34436	LINCOLN	NE	ALPHA 3E LICENSEE LLC	DAVID CITY TIER & ELECTRIC CO.
KFPW	23868	FORT SMITH	AR	PHARIS BROADCASTING, INC.	ST. JOHNS CHURCH
KFQD	52675	ANCHORAGE	AK	ALPHA MEDIA LICENSEE LLC	CHOVIN SUPPLY CO.
KFRU	12396	COLUMBIA	MO	CUMULUS LICENSING LLC	STEPHENS COLLEGE
KFUO	39258	CLAYTON	MO	LUTHERAN CHURCH- MISSOURI SYNOD	CONCORDIA COLLEGE
KFWB	25457	LOS ANGELES	CA	UNIVERSAL MEDIA ACCESS KFWB-AM, LLC	WARNER BROTHERS PICTURES, INC.
KFYO	61151	LUBBOCK	TX	TOWNSQUARE MEDIA LUBBOCK LICENSE, LLC	KIRKLEY BROS. BATTERY & ELECTRIC CO.

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
KFYR	41426	BISMARCK	ND	CITICASTERS LICENSES, INC.	HOSKINS-MEYER, INC
KGA	11234	SPOKANE	WA	MAPLETON LICENSE OF SPOKANE, LLC	NORTHWEST RADIO SERVICE CO.
KGEZ	60575	KALISPELL	MT	FLATHEAD BROADCASTING, LLC	FLATHEAD BROADCASTING ASSOCIATION
KGFF	28152	SHAWNEE	OK	CITIZEN POTAWATOMI NATION	EARL R. HAMPSHIRE
KGFW	9933	KEARNEY	NE	NRG LICENSE SUB, LLC	OTTO E. SOTHOVAN
KGFX	30209	PIERRE	SD	JAMES RIVER BROADCASTING COMPANY	DANA MCNEILL
KGGF	34462	COFFEYVILLE	KS	SEK MEDIA, LLC	DR. D.L. CONNELL
KGHL	50354	BILLINGS	MT	KGHL RADIO, LLC	NORTHWESTERN AUTO SUPPLY CO.
KGIW	12814	ALAMOSA	CO	WOLF CREEK BROADCASTING, LLC	TRINIDAD CREAMERY CO.
KGKL	34464	SAN ANGELO	TX	TOWNSQUARE MEDIA SAN ANGELO LICENSE, LLC	M.L. CATES
KGNO	37130	DODGE CITY	KS	ROCKING M MEDIA, LLC	MELVIN A. MCCOLLOM
KGO	34471	SAN FRANCISCO	CA	RADIO LICENSE HOLDINGS LLC	GENERAL ELECTRIC CO.
KGU	53705	HONOLULU	HI	SALEM MEDIA OF HAWAII, INC.	MARLON A. MULRONY
KGVO	71751	MISSOULA	MT	TOWNSQUARE MEDIA MISSOULA LICENSE, LLC	MOSBY'S, INC.
KHJ	37224	LOS ANGELES	CA	IHR EDUCATIONAL BROADCASTING	C.R. KIEROLFF & CO.
KICA	61577	CLOVIS	NM	TEJAS BROADCASTING LTD, LLP	W.E. WHITMORE
KID	22194	IDAHO FALLS	ID	RICH BROADCASTING IDAHO LS, LLC	JACK W. DUCKWORTH JR.
KIT	64398	YAKIMA	WA	TOWNSQUARE MEDIA YAKIMA LICENSE, LLC	MELER & FRANK CO.
KLCN	63606	BLYTHEVILLE	AR	SUDBURY SERVICES, INC.	DAILY COURIER NEWS
KLO	35069	OGDEN	UT	KLO BROADCASTING CO.	H.W. PERRY AND C. REDFIELD
KLZ	35088	DENVER	CO	KLZ RADIO, INC.	REYNOLDS RADIO CO.
KMA	35107	SHENANDOAH	IA	KMA BROADCASTING L.P.	MAY SEED & NURSERY CO.
KMED	14352	MEDFORD	OR	BICOASTAL MEDIA LICENSES VI, LLC	W.J. VIRGIN
KMJ	26923	FRESNO	CA	CUMULUS LICENSING LLC	SAN JOAQUIN LIGHT & POWER CORPORATION
KMMJ	9937	GRAND ISLAND	NE	THE PRAISE NETWORK, INC.	M.M. JOHNSON CO



<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
KMOX	9638	ST. LOUIS	MO	CBS RADIO EAST INC.	VOICE OF ST. LOUIS, INC.
KNX	9616	LOS ANGELES	CA	CBS RADIO EAST INC.	ELECTRIC LIGHTING SUPPLY CO.
KOA	29738	DENVER	CO	CITICASTERS LICENSES, INC.	GENERAL ELECTRIC CO.
KOAC	50587	CORVALLIS	OR	OREGON PUBLIC BROADCASTING	OREGON AGRICULTURAL COLLEGE
KONO	50029	SAN ANTONIO	TX	COX RADIO, INC.	GENE ROTH & CO.
KPOF	52600	DENVER	CO	PILLAR OF FIRE	J.W. DIETZ
KPQ	71715	WENATCHEE	WA	CCR-WESCOAST IV, LLC	LOUIS WARDNER
KPRC	9644	HOUSTON	TX	CC LICENSES, LLC	POST DISPATCH
KQV	8445	PITTSBURGH	PA	CALVARY, INC.	DOUBLEDAY-HILL ELECTRIC CO.
KRLD	59820	DALLAS	TX	CBS RADIO TEXAS INC.	DALLS RADIO LABORATORIES
KRMD	1305	SHREVEPORT	LA	CUMULUS LICENSING LLC	CADDO RADIO CLUB
KSCJ	21691	SIOUX CITY	IA	KSUX/KSCJ RADIO BROADCASTING CO	SIOUX CITY JOURNAL
KSL	6375	SALT LAKE CITY	UT	BONNEVILLE INTERNATIONAL CORPORATION	THE DESERET NEWS
KSOO	64710	SIOUX FALLS	SD	TOWNSQUARE MEDIA SIOUX FALLS LICENSE, LLC	SIOUX FALLS BROADCASTING ASSOCIATION
KSTP	35641	ST. PAUL	MN	KSTP-AM, LLC	BEACON RADIO SERVICE
KTAR	52515	PHOENIX	AZ	BONNEVILLE INTERNATIONAL CORPORATION	MCARTHUR BROS. MERCANTILE CO.
KTFI	69857	TWIN FALLS	ID	SALT & LIGHT RADIO, INC.	STANLEY M. SOULE
KTRH	35674	HOUSTON	TX	AMFM TEXAS LICENSES LLC	UNIVERSITY OF TEXAS
KTSA	71087	SAN ANTONIO	TX	ALPHA MEDIA LICENSEE LLC	ALAMO RADIO ELECTRIC CO.
KUJ	35718	WALLA WALLA	WA	ALEXANDRA COMMUNICATIONS, INC.	PUGET SOUND RADIO BROADCASTING CO.
KUOA	35729	SILAM SPRINGS	AR	HOG RADIO, INC.	UNIVERSITY OF ARKANSAS
KVI	35853	SEATTLE	WA	SINCLAIR RADIO OF SEATTLE LICENSEE, LLC	PUGET SOUND BROADCASTING CO. (H.W. WINNINGHAM)
KWG	60418	STOCKTON	CA	IHR EDUCATIONAL BROADCASTING	PORTABLE WIRELESS TELEPHONE CO.
KWKH	60266	SHREVEPORT	LA	TOWNSQUARE MEDIA SHREVEPORT LICENSE, LLC	W.G. PATTERSON (GLENWOOD RADIO CORP.)

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
KWLC	39255	DECORAH	IA	LUTHER COLLEGE	NORWEGIAN LUTHER COLLEGE
KXO	35969	EL CENTRO	CA	KXO, INC.	E.R. FREY AND F.M. BOWLES
KXRO	52674	ABERDEEN	WA	ALPHA MEDIA LICENSEE LLC	KXRO INC.
KXYZ	95	HOUSTON	TX	MULTICULTURAL RADIO BROADCASTING LICENSEE, LLC	UHALT ELECTRIC (W.J. UHALT)
KYW	25441	PHILADELPHIA	PA	CBS RADIO EAST INC.	WESTINGHOUSE ELECTRIC & MANUFACTURING CO.
WAPI	16900	BIRMINGHAM	AL	RADIO LICENSE HOLDING CBC, LLC	ALABAMA POLYTECHNIC INSTITUTE
WBAA	53946	WEST LAFAYETTE	IN	PURDUE UNIVERSITY	PURDUE UNIVERSITY
WBAL	65679	BALTIMORE	MD	HEARST STATIONS INC.	CONSOLIDATED GAS, ELECTRIC LIGHT & POWER CO.
WBAP	71200	FORT WORTH	TX	RADIO LICENSE HOLDINGS LLC	WORTHAM-CARTER PUBLISHING CO.
WBAX	66365	WILKES-BARRE	PA	THE SCRANTON TIMES, L.P.	JOHN H. STENGER JR.
WBBM	9631	CHICAGO	IL	CBS RADIO EAST INC.	FRANK ATCLASS PRODUCE CO.
WBBZ	52931	PONCA CITY	OK	CLYDE A., JOHN S., AND THOMAS C. MUCHMORE DBA PONCA CITY PUB	C.L. CARROLL
WBEN	34381	BUFFALO	NY	ENTERCOM BUFFALO LICENSE, LLC	NORTON LABORATORIES
WBT	30830	CHARLOTTE	NC	GREATER MEDIA CHARLOTTE INC	SOUTHERN RADIO CORP.
WBTM	52544	DANVILLE	VA	PIEDMONT BROADCASTING CORP.	CLARKE ELECTRIC CO.
WBZ	25444	BOSTON	MA	CBS RADIO EAST INC.	WESTINGHOUSE ELECTRIC & MANUFACTURING CO.
WCAO	63777	BALTIMORE	MD	CITICASTERS LICENSES, INC.	SANDERS & STAYMAN CO.
WCBM	4759	BALTIMORE	MD	WCBM MARYLAND, INC.	CHARLES SWARZ
WCCO	9642	MINNEAPOLIS	MN	CBS RADIO MEDIA CORPORATION	WASHBURN-CROSBY CO.
WCKY	51722	CINCINNATI	OH	CITICASTERS LICENSES, INC.	L.B. WILSON
WCLO	61390	JANESVILLE	WI	SOUTHERN WISCONSIN BROADCASTING, LLC.	C.E. WHITEMORE
WCOA	12142	PENSACOLA	FL	CUMULUS LICENSING LLC	CITY OF PENSACOLA
WDAS	71315	PHILADELPHIA	PA	AMFM RADIO LICENSES, L.L.C.	OCEAN CITY YACHT CLUB

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
WDAY	22126	FARGO	ND	FORUM COMMUNICATIONS COMPANY	KENNETH M. HANCE
WDBO	48726	ORLANDO	FL	COX RADIO, INC.	ROLLINS COLLEGE
WDEL	16458	WILMINGTON	DE	DELMARVA BROADCASTING COMPANY	WILMINGTON ELECTRIC SPECIALTY CO.
WDEV	54866	WATERBURY	VT	RADIO VERMONT, INC.	HARRY C. WHITEHILL
WDRC	7711	HARTFORD	CT	CONNOISSEUR MEDIA LICENSES, LLC	DOOLITTLE RADIO CORP
WDZ	53348	DECATUR	IL	NEUHOF MEDIA DECATUR, LLC	JAMES L. BUSH
WEBC	49689	DULUTH	MN	TOWNSQUARE MEDIA DULUTH LICENSE, LLC	WALTER C. BRIDGES
WEBQ	70348	HARRISBURG	IL	WEBQ, LLC	TATE RADIO CO
WEEU	70508	READING	PA	WEEU BROADCASTING COMPANY	BERKS BROADCASTING CO.
WEW	1088	ST. LOUIS	MO	BIRACH BROADCASTING CORPORATION	SAINT LOUIS UNIVERSITY
WEXL	61679	ROYAL OAK	MI	WMUZ RADIO, INC.	ROBERT L. MILLER
WFBG	38269	ALTOONA	PA	FM RADIO LICENSES, LLC	WILLIAM F. GABLE CO.
WFBL	34821	SYRACUSE	NY	LEATHERSTOCKING MEDIA GROUP, INC.	ONOODAGA HOTEL
WFDF	13664	FARMINGTON HILLS	MI	CHURCH OF THE WORD	FALLIAN & LATHROP
WFEA	58543	MANCHESTER	NH	SAGA COMMUNICATIONS OF NEW ENGLAND, LLC	RINES HOTEL CO.
WGBB	72091	FREEPORT	NY	WGBB-AM, INC.	HARRY H. CARMAN
WGBF	660	EVANSVILLE	IN	TOWNSQUARE MEDIA OF EVANSVILLE/OWENSBORO, INC.	FLAKE FURNITURE CO.
WGH	72103	NEWPORT NEWS	VA	MHR LICENSE LLC	RADIO CORPORATION OF VIRGINIA
WGL	22285	FORT WAYNE	IN	ADAMS RADIO OF FORT WAYNE, LLC	LAUE AUTO CO.
WGN	72114	CHICAGO	IL	WGN CONTINENTAL BROADCASTING COMPANY, LLC	MID WEST RADIO CENTRAL, INC.
WGR	56101	BUFFALO	NY	ENTERCOM BUFFALO LICENSE, LLC	FEDERAL TELEPHONE & TELEGRAPH CO.
WGY	15329	SCHENECTADY	NY	CC LICENSES, LLC	GENERAL ELECTRIC CO.
WHA	6139	MADISON	WI	BOARD REGENTS OF UNIV OF WI SYSTEM	UNIVERSITY OF WISCONSIN
WHAM	37545	ROCHESTER	NY	CITICASTERS LICENSES, INC.	UNIVERSITY OF ROCHESTER

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
WHAS	11934	LOUISVILLE	KY	CC LICENSES, LLC	COURIER-JOURNAL AND LOUISVILLE TIMES
WHAT	33686	PHILADELPHIA	PA	AZTEC CAPITAL PARTNERS, INC.	LENNING BROTHERS CO.
WHAZ	8674	TROY	NY	CAPITAL MEDIA CORPORATION	RENSSELER POLYTECHNIC INSTITUTE
WHBC	4489	CANTON	OH	ALPHA MEDIA LICENSEE LLC	REV E.P. GRAHAM
WHBQ	21727	MEMPHIS	TN	FLINN BROADCASTING CORPORATION	MEN'S FELLOWSHIP CLASS AT ST. JOHN'S M.E. CHURCH SOUTH
WHBU	2212	ANDERSON	IN	WOOF BOOM RADIO MUNCIE LICENSE LLC	B.L. BING'S SONS
WHDL	2863	OLEAN	NY	COMMUNITY BROADCASTERS, LLC	GEORGE F. BISSELL
WHIS	502	BLUEFIELD	WV	ALPHA MEDIA LICENSEE LLC	DAILY TELEGRAPH PRINTING CO.
WHK	72299	CLEVELAND	OH	COMMON GROUND BROADCASTING, INC.	WILLIAM R. COX
WHO	51331	DES MOINES	IA	CITICASTERS LICENSES, INC.	BANKERS LIFE CO.
WHP	15322	HARRISBURG	PA	CLEAR CHANNEL BROADCASTING LICENSES, INC.	JOHN S. SKANE
WIBW	63169	TOPEKA	KS	ALPHA MEDIA LICENSEE LLC	L.L. DILL
WIBX	168	UTICA	NY	TOWNSQUARE MEDIA LICENSEE OF UTICA/ROME, INC.	GRID-LESK, INC.
WILL	68941	URBANA	IL	THE BOARD OF TRUSTEES OF THE UNIVERSITY OF ILLINOIS	UNIVERSITY OF ILLINOIS
WILM	16438	WILMINGTON	DE	CITICASTERS LICENSES, INC.	E. BRANDT BOYLAN
WIOD	14242	MIAMI	FL	CLEAR CHANNEL BROADCASTING LICENSES, INC.	CARL G. FLAHER
WISN	65695	MILWAUKEE	WI	CAPSTAR TX, LLC	SCHOOL OF ENGINEERING OF MILWAUKEE AND WISCONSIN NEWS
WJAG	73121	NORFOLK	NE	WJAG, INC.	NORFOLK DAILY NEWS (HUSE PUBLISHING CO.)
WJAS	55705	PITTSBURGH	PA	PITTSBURGH RADIO PARTNERS LLC	PITTSBURGH RADI SUPPLY HOUSE
WJBC	5876	BLOOMINGTON	IL	CUMULUS LICENSING LLC	HUMMER FURNITURE CO.

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
WJMS	57223	IRONWOOD	MI	J & J BROADCASTING, INC.	JOHNSON MUSIC STORE (MARIUS JOHNSON, PROPRIETOR)
WJR	8626	DETROIT	MI	RADIO LICENSE HOLDINGS LLC	JEWETT RADIO & PHONOGRAPH CO.
WKBN	70519	YOUNGSTOWN	OH	CITICASTERS LICENSES, INC.	RADIO ELECTRIC SERVICE CO. (W.P. WILLIAMSON JR.)
WKBV	41848	RICHMOND	IN	RODGERS BROADCASTING CORPORATION	KNOX BATTERY AND ELECTRIC CO.
WKRC	29737	CINCINNATI	OH	CITICASTERS LICENSES, INC.	PRECISION EQUIPMENT CO.
WKY	23418	OKLAHOMA CITY	OK	RADIO LICENSE HOLDING CBC, LLC	OKLAHOMA RADIO SHOP
WKZO	54485	KALAMAZOO	MI	MIDWEST COMMUNICATIONS, INC.	EMMANUEL MISSIONARY COLLEGE
WLAC	34391	NASHVILLE	TN	CAPSTAR TX, LLC	DAD'S AUTO ACCESSORIES, INC.
WLAP	68209	LEXINGTON	KY	CITICASTERS LICENSES, INC.	W.V. JORDEN
WLBL	63138	AUBURNDALE	WI	STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD	WISCONSIN DEPARTMENT OF MARKETS
WLS	73227	CHICAGO	IL	RADIO LICENSE HOLDINGS LLC	SEARS, ROEBUCK & CO.
WLVA	39579	LYNCHBURG	VA	BRENT EPPERSON	EDWARD A. & PHILIP P. ALLEN
WLW	29733	CINCINNATI	OH	CITICASTERS LICENSES, INC.	CROSLEY MANUFACTURING CO.
WMAL	73250	WASHINGTON	DC	RADIO LICENSE HOLDINGS LLC	M.A. LEEKO OPTICAL CO.
WMBD	42119	PEORIA	IL	ALPHA MEDIA LICENSEE LLC	PEORIA HEIGHTS RADIO LABORATORY
WMBI	65972	CHICAGO	IL	THE MOODY BIBLE INSTITUTE OF CHICAGO	MOODY BIBLE INSTITUTE OF CHICAGO
WMC	19185	MEMPHIS	TN	ENTERCOM LICENSE, LLC	COMMERCIAL APPEAL
WMCA	58626	NEW YORK	NY	SALEM MEDIA OF NEW YORK, LLC	HOTEL MCALPIN (GREETLY SQUARE HOTEL CO.)
WMMN	21171	FAIRMONT	WV	SPECTRUM RADIO FAIRMONT LLC	HOLT-HOWE NOVELTY CO.
WMPC	65496	LAPEER	MI	THE CALVARY BIBLE CHURCH OF LAPEER	FIRST METHODIST PROTESTANT CHURCH
WMT	73593	CEDAR RAPIDS	IA	CITICASTERS LICENSES, INC.	D.M. PERHAM
WNAX	57846	YANKTON	SD	SAGA COMMUNICATIONS, INC.	DAKOTA RADIO APPARATUS CO.

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
WNBF	72372	BINGHAMTON	NY	TOWNSQUARE MEDIA BINGHAMTON LICENSE, LLC	HEWITT-WOOD RADIO CO.
WNBH	25866	NEW BEDFORD	MA	HALL COMMUNICATIONS, INC.	IRVING J. VERMILYA AND A.J. LOPEZ
WNBZ	73314	SARANAC LAKE	NY	SARANAC LAKE RADIO, L.L.C.	SMITH AND MACE
WNYC	73357	NEW YORK	NY	NEW YORK PUBLIC RADIO	CITY OF NEW YORK
WOAI	11952	SAN ANTONIO	TX	CC LICENSES, LLC	SOUTHERN EQUIPMENT CO.
WOC	60360	DAVENPORT	IA	CITICASTERS LICENSES, INC.	KARLOWA RADIO CO.
WOI	29119	AMES	IA	IOWA STATE UNIVERSITY OF SCIENCE AND TECHNOLOGY	IOWA STATE COLLEGE
WOMT	59610	MANITOWOC	WI	SEEHAFER BROADCASTING CORP	MIKADOR THEATRE (FRANCIS M. KADOW)
WOOD	73604	GRAND RAPIDS	MI	CC LICENSES, LLC	GRAND RAPIDS RADIO CO.
WOPI	31405	BRISTOL	TN	HOLSTON VALLEY BROADCASTING CORPORATION	WILSON RADIOPHONE SERVICE CO.
WOR	7710	NEW YORK	NY	AMFM RADIO LICENSES, LLC	L. BAMBERGER AND CO.
WOWO	28205	FORT WAYNE	IN	PATHFINDER COMMUNICATIONS CORPORATION	MAIN AUTO SUPPLY CO.
WPTF	21630	RALEIGH	NC	FIRST STATE COMMUNICATIONS	WAYNE RADIO CO.
WQAM	64002	MIAMI	FL	CBS RADIO STATIONS INC.	ELECTRICAL EQUIPMENT CO.
WQBC	60000	VICKSBURG	MS	COSTAR BROADCAST GROUP	L.B. JONES
WRAK	15325	WILLIAMSPORT	PA	CLEAR CHANNEL BROADCASTING LICENSES, INC.	ECONOMY LIGHT CO.
WRAW	69566	READING	PA	CLEAR CHANNEL BROADCASTING LICENSES, INC.	AVENUE RADIO SHOP (HORACE D. GOOD)
WREC	58396	MEMPHIS	TN	CC LICENSES, LLC	WOOTEN'S RADIO SHOP
WRJN	41437	RACINE	WI	MAGNUM COMMUNICATIONS, INC.	RACINE RADIO STATION
WRUF	69151	GAINESVILLE	FL	UNIVERSITY OF FLORIDA	FIRST AVENUE METHODIST CHURCH
WRVA	11914	RICHMOND	VA	CC LICENSES, LLC	LAURUS & BROTHER CO.

<b>Call Sign</b>	<b>Fac ID</b>	<b>Community</b>		<b>Current Licensee</b>	<b>Pioneer (original) Licensee</b>
WSAI	41994	CINCINNATI	OH	CITICASTERS LICENSES, INC.	UNITED STATES PLAYING CARD CO.
WSAN	18233	ALLENTOWN	PA	CAPSTAR TX, LLC	ALLENTOWN CALL PUBLISHING CO.
WSAR	6879	FALL RIVER	MA	BRISTOL COUNTY BROADCASTING, INC.	DOUGHTY & WELCH ELECTRICAL CO.
WSB	73977	ATLANTA	GA	COX RADIO, INC.	ATLANTA JOURNAL
WSBC	16847	CHICAGO	IL	WSBC, INC.	WORLD BATTERY CO.
WSJS	58391	WINSTON-SALEM	NC	CRESCENT MEDIA GROUP LLC	WINSTON-SALEM JOURNAL CO.
WSM	74066	NASHVILLE	TN	GRAND OLE OPRY, LLC	NATIONAL LIFE & ACCIDENT INSURANCE CO.
WSPD	62187	TOLEDO	OH	CITICASTERS LICENSES, INC.	TOLEDO RADIO & ELECTRIC CO
WSYB	25740	RUTLAND	VT	6 JOHNSON ROAD LICENSES, INC.	SEWARD & WEISS MUSIC STORE (H.E. SEWARD JR. AND PHILLIP WEISS)
WSYR	48720	SYRACUSE	NY	CC LICENSES, LLC	CLIVE B. MERIDITH
WTAG	35230	WORCESTER	MA	CAPSTAR TX, LLC	WORCESTER TELEGRAM PUBLISHING CO.
WTAM	59595	CLEVELAND	OH	CITICASTERS LICENSES, INC.	WILLARD STORAGE BATTERY CO.
WTAQ	42086	GREEN BAY	WI	MIDWEST COMMUNICATIONS, INC.	S.H. VANGORDAN & SON
WTAX	9961	SPRINGFIELD	IL	SAGA COMMUNICATIONS OF ILLINOIS, LLC	WILLIAMS HARDWARE CO.
WTBO	74082	CUMBERLAND	MD	FM RADIO LICENSES, LLC	CUMBERLAND ELECTRIC CO.
WTIC	66464	HARTFORD	CT	CBS RADIO STATIONS INC.	TRAVELERS INSURANCE CO.
WTMJ	74096	MILWAUKEE	WI	SCRIPPS BROADCASTING HOLDINGS LLC	WKAF BROADCASTING CO.
WWJ	9621	DETROIT	MI	CBS RADIO EAST INC.	DETROIT NEWS
WWL	34377	NEW ORLEANS	LA	ENTERCOM NEW ORLEANS LICENSE, LLC	LOYOLA UNIVERSITY
WWNC	2946	ASHEVILLE	NC	CAPSTAR TX, LLC	ASHEVILLE BATTERY CO.
WWVA	44046	WHEELING	WV	CAPSTAR TX, LLC	JOHN C. STROBEL, JR.

**APPENDIX B**  
**AM FACILITIES IDENTIFIED AS FORMERLY HAVING**  
**HISTORICALLY PROTECTED CALL SIGNS**

The “Herit. Call” is the three-digit or non-conforming heritage call sign that the facility used prior to June 1, 1932. The “curr call” is the call sign the station is currently using. Under the proposal, these stations would have the option and ability to obtain their former heritage call sign. It is possible that the heritage call sign is currently assigned to another station. Nothing in this proposal allows a heritage station from “taking” their former call sign already in use at another station. We were not able to find any of the three-letter callsigns in the Universal Licensing System and as far as we know, none of these call signs have been reused by coast stations.

Herit. Call	Curr. Call	Fac ID	Community		Current Licensee	Pioneer (original) Licensee
KDB	KSPE	61712	SANTA BARBARA	CA	RINCON BROADCASTING LS LLC	SANTA BARBARA BROADCASTING CO.
KFGZ	WKZO	54485	KALAMAZOO	MI	MIDWEST COMMUNICATIONS, INC.	EMMANUEL MISSIONARY COLLEGE
KFH	KNSS	53152	WICHITA	KS	ENTERCOM LICENSE, LLC	WICHITA BOARD OF TRADE AND LANDER RADIO CO.
KFNG	WREC	58396	MEMPHIS	TN	CC LICENSES, LLC	WOOTEN'S RADIO SHOP
KGB	KLSD	34452	SAN DIEGO	CA	CITICASTERS LICENSES, INC.	W.K. ASBILL
KGW	KPOJ	53069	PORTLAND	OR	CITICASTERS LICENSES, INC.	OREGONIAN PUBLISHING CO.
KGY	KBUP	34486	OLYMPIA	WA	SACRED HEART RADIO, INC.	ST. PARTINS COLLEGE (REV S. RUTH)
KHQ	KQNT	60421	SPOKANE	WA	CAPSTAR TX, LLC	LOUIS WASMER
KJR	KOMO	21647	SEATTLE	WA	SINCLAIR RADIO OF SEATTLE LICENSEE, LLC	VINCENT L. KRAFT
KJS	KWKW	38454	LOS ANGELES	CA	LOTUS LOS ANGELES CORP.	BIBLE INSTITUTE OF LOS ANGELES
KLS	KMKY	96	OAKLAND	CA	AKAL BROADCASTING CORPORATION	WARNER BROTHERS
KLX	KKSF	59966	OAKLAND	CA	AMFM BROADCASTING LICENSES, LLC	TRIBUNE PUBLISHING CO.
KOB	KKOB	11251	ALBUQUERQUE	NM	RADIO LICENSE HOLDING CBC, LLC	NEW MEXICO COLLEGE OF AGRICULTURE AND MECHANIC ARTS
KOL	KKOL	20355	SEATTLE	WA	INSPIRATION MEDIA, INC.	THE RHODES CO.
KOY	KFYI	63918	PHOENIX	AZ	AMFM RADIO LICENSES, L.L.C.	NIELSEN RADIO SUPPLY CO.



Legacy Call	Curr. Call	Fac ID	Community		Current Licensee	Pioneer (original) Licensee
KPO	KNBR	35208	SAN FRANCISCO	CA	RADIO LICENSE HOLDING SRC LLC	HALE BROS.
KQP	KUFO	26926	PORTLAND	OR	ALPHA MEDIA LICENSEE LLC	BLUE DIAMOND ELECTRIC CO.
KQV	KQV	8445	PITTSBURGH	PA	CALVARY, INC.	DOUBLEDAY-HILL ELECTRIC CO.
KQW	KCBS	9637	SAN FRANCISCO	CA	CBS RADIO EAST INC.	CHARLES D. HERROLD
KRE	KVTO	28681	BERKELEY	CA	PHAM RADIO COMMUNICATION LLC	MAXWELL ELECTRIC CO.
KSD	KTRS	20359	ST. LOUIS	MO	KTRS-AM LICENSE, L.L.C.	POST DISPATCH
KTSL	WAML	52617	LAUREL	MS	WALKING BY FAITH MINISTRIES, INC.	BATES RADIO & ELECTRIC CO.
KTW	KKDZ	12112	SEATTLE	WA	UNIVERSAL MEDIA ACCESS KKDZ-AM LLC	FIRST PRESBYTERIAN CHURCH
KUT	KTAE	41211	AUSTIN	TX	GENUINE AUSTIN RADIO, LP	RADIO ENGINEERS
KUT	KTRH	35674	HOUSTON	TX	AMFM TEXAS LICENSES LLC	UNIVERSITY OF TEXAS
KVL	KFNQ	6387	SEATTLE	WA	CBS RADIO STATIONS INC.	A.C. DAILEY
KXA	KTTH	27023	SEATTLE	WA	BONNEVILLE INTERNATIONAL CORPORATION	BRIT F. FISHER
KXL	KXTG	948	PORTLAND	OR	ALPHA MEDIA LICENSEE LLC	KXL BROADCASTERS (LOVE ELECTRIC CO.)
KYA	KSFB	6369	SAN FRANCISCO	CA	IHR EDUCATIONAL BROADCASTING	PACIFIC BROADCAST CORPORATION (VINCENT I. KRAFT)
KYW	KYW	25441	PHILADELPHIA	PA	CBS RADIO EAST INC.	WESTINGHOUSE ELECTRIC & MANUFACTURING CO.
KZN	KSL	6375	SALT LAKE CITY	UT	BONNEVILLE INTERNATIONAL CORPORATION	THE DESERET NEWS
WACO	KCLE	59263	BURLESON	TX	INTELLI, LLC	JACKSON'S RADIO ENGINEERING LABORATORIES
WBL	WWJ	9621	DETROIT	MI	CBS RADIO EAST INC.	DETROIT NEWS
WBRR	KYYS	73938	KANSAS CITY	KS	ENTERCOM LICENSE, LLC	JENNY WRAO CO.
WDGY	KTLK	59961	MINNEAPOLIS	MN	AMFM BROADCASTING LICENSES, LLC	DR. GEORGE W. YOUNG
WDIX	KTFS	33729	TEXARKANA	TX	TEXARKANA RADIO CENTER LICENSES, LLC	W.A. BLAIR AND JOHN R ANDERSON

Legacy Call	Curr. Call	Fac ID	Community		Current Licensee	Pioneer (original) Licensee
WEAH	KNSS	53152	WICHITA	KS	ENTERCOM LICENSE, LLC	WICHITA BOARD OF TRADE AND LANDER RADIO CO.
WEB	KZQZ	72391	ST LOUIS	MO	ENTERTAINMENT MEDIA TRUST, DENNIS J. WATKINS, TRUSTEE	BENWOOD CO.
WFAA	KLIF	35061	DALLAS	TX	KLIF LICO, INC.	A.H. BELO & CO.
WFI	WFIL	52193	PHILADELPHIA	PA	PENNSYLVANIA MEDIA ASSOCIATES, INC.	STRAWBRIDGE & CLOTHIER
WGAQ	KWKH	60266	SHREVEPORT	LA	TOWNSQUARE MEDIA SHREVEPORT LICENSE, LLC	W.G. PATTERSON (GLENWOOD RADIO CORP.)
WHN	WEPN	65636	NEW YORK	NY	NEW YORK AM RADIO, LLC	RIDGEWOOD TIMES PRINTING & PUBLISHING CO
WIL	KZQZ	72391	ST LOUIS	MO	ENTERTAINMENT MEDIA TRUST, DENNIS J. WATKINS, TRUSTEE	BENWOOD CO.
WILL	WILL	68941	URBANA	IL	THE BOARD OF TRUSTEES OF THE UNIVERSITY OF ILLINOIS	UNIVERSITY OF ILLINOIS
WIP	WTEL	28626	PHILADELPHIA	PA	WXTU LICENSE LIMITED PARTNERSHIP	GIMBEL BROTHERS
WIS	WVOC	11902	COLUMBIA	SC	CAPSTAR TX, LLC	GEORGE T. BARNES (INC.)
WJW	WKNR	28509	CLEVELAND	OH	GOOD KARMA BROADCASTING, LLC	JOHN F. WELENER AND D.A. SNICK
WJZ	WABC	70658	NEW YORK	NY	RADIO LICENSE HOLDINGS LLC	WESTINGHOUSE ELECTRIC & MANUFACTURING CO.
WLB	KUOM	69337	MINNEAPOLIS	MN	UNIVERSITY OF MINNESOTA	UNIVERSITY OF MINNESOTA
WMH	WKRC	29737	CINCINNATI	OH	CITICASTERS LICENSES, INC.	PRECISION EQUIPMENT CO.
WOW	KXSP	50313	OMAHA	NE	SCRIPPS BROADCASTING HOLDINGS LLC	WOODMEN OF THE WORLD
WQDV	KTFS	33729	TEXARKANA	TX	TEXARKANA RADIO CENTER LICENSES, LLC	W.A. BLAIR AND JOHN R ANDERSON
WRC	WTEM	25105	WASHINGTON	DC	RED ZEBRA BROADCASTING LICENSEE, LLC	RADIO CORPORATION OF AMERICA
WREN	KYYS	73938	KANSAS CITY	KS	ENTERCOM LICENSE, LLC	JENNY WRAO CO.
WRM	WILL	68941	URBANA	IL	THE BOARD OF TRUSTEES OF THE UNIVERSITY OF ILLINOIS	UNIVERSITY OF ILLINOIS

Legacy Call	Curr. Call	Fac ID	Community		Current Licensee	Pioneer (original) Licensee
WRR	KTCK	8773	DALLAS	TX	RADIO LICENSE HOLDING SRC LLC	CITY OF DALLAS (POLICE AND FIRE SIGNAL DEPT.)
WSY	WAPI	16900	BIRMINGHAM	AL	RADIO LICENSE HOLDING CBC, LLC	ALABAMA POLYTECHNIC INSTITUTE